

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA *ex rel.*  
KAREN ATESOGLU, and KAREN  
ATESOGLU, individually,

Plaintiffs,

v.

RAYTHEON TECHNOLOGIES  
CORPORATION,

Defendant.

21-CV-10690-PBS

**FILED UNDER SEAL**

**UNITED STATES' NOTICE OF ELECTION  
TO PARTIALLY INTERVENE FOR PURPOSE OF SETTLEMENT  
AS TO RAYTHEON TECHNOLOGIES CORPORATION**

Pursuant to the False Claims Act, 31 U.S.C. § 3730(b)(2) and (4), the United States notifies the Court of its decision to partially intervene in this action solely for the purposes of settlement with the defendant Raytheon Technologies Corporation ("Raytheon"). In particular, the United States intervenes only as to the allegations in the Relator's Complaint relating to Contracts 10-14 in Appendix A attached hereto.

The United States, Raytheon, and the Relator executed a settlement agreement effective October 16, 2024 ("Settlement Agreement"), which resolves this False Claims Act action as to Raytheon. Pursuant to the Settlement Agreement, the United States and the Relator will file promptly a Joint Stipulation of Dismissal of this case pursuant to Rule 41(a)(1) once Raytheon has made the settlement payment to the United States as required by the Settlement Agreement.

In accordance with the Court's Order on October 9, 2024 [Dkt. No. 55] ("Order"), upon filing of this Notice of Election to Partially Intervene, the case is unsealed, and the government

requests, consistent with the Court's Order, that only this Notice, the Relator's Complaint, and all future filings shall be made available on the public docket.

Respectfully submitted,

BRIAN M. BOYNTON  
Principal Deputy Assistant Attorney General  
Civil Division

JOSHUA S. LEVY  
Acting United States Attorney

/s/Brian M. LaMacchia  
Brian M. LaMacchia (BBO #664369)  
Assistant United States Attorney  
John J. Moakley U.S. Courthouse, Suite 9200  
1 Courthouse Way  
Boston, MA 02210  
Phone: (617) 748-3100  
brian.lamacchia@usdoj.gov

JAMIE ANN YAVELBERG  
ROBERT McAULIFFE  
ART COULTER  
PATRICK KLEIN  
JARED S. WIESNER  
Attorneys, Civil Division  
United States Department of Justice  
P.O. Box 261 - Ben Franklin Station  
Washington, D.C. 20044

Dated: October 16, 2024

**CERTIFICATE OF SERVICE**

I certify that the foregoing document was served on the relator's counsel, by electronic mail at the address below (with the relator's assent to electronic service), on the below date:

Patrick S. Almonrode  
Jason T. Brown  
111 Town Place Square, Suite 400  
Jersey City, NJ 07310  
(877) 561-0000 (office)  
(855) 582-5297 (fax)  
patalmonrode@jtblawgroup.com  
jtb@jtblawgroup.com

Dated: October 16, 2024

/s/Brian M. LaMacchia  
Assistant United States Attorney